

R E M A R K S

Careful review and examination of the subject application are noted and appreciated.

SUPPORT FOR CLAIM AMENDMENTS

Support for the amendments to the claims can be found on page 9, line 16 through page 10, line 5, throughout the specification and in the originally filed claim 10. No new matter has been added.

CLAIM OBJECTIONS

The objection to claims 12-20 has been obviated by appropriate amendment and should be withdrawn.

CLAIM REJECTIONS UNDER 35 U.S.C. §102

The rejection of claims 1-21 under 35 U.S.C. §102 as being anticipated by Bilbrey has been obviated by appropriate amendment and should be withdrawn.

Bilbrey discloses a programmable digital video processing system (Title).

In contrast, the present invention provides an apparatus comprising a first circuit and a second circuit. The first circuit may be configured to calculate and write an output signal having a first resolution and a plurality of output pixels to a memory in

response to (i) an input signal having a second resolution and a plurality of input pixels read from the memory and (ii) one or more control signals. The second circuit may be configured to generate the control signals in response to (i) a previous calculation by the first circuit and (ii) one or more input parameters. The first circuit may be configured to scale and filter the input signal to allow one or more of the input pixels to contribute to the creation of one or more of the output pixels. Claims 12 and 13 provide similar limitations.

Bilbrey appears silent regarding a number of the claimed elements. For example, Bilbrey seems silent regarding an input signal, as presently claimed. At best, although not clear in the Office Action, Bilbrey receives a capture input through the three inputs 68. However, such an input is analog, which is neither read from a memory nor comprises a plurality of input pixels, as presently claimed. Bilbrey consistently describes these signals as "the three analog signals" (see column 5, lines 5-6). The signals are received and processed prior to the A/D converter circuit 70. Prior to the circuit 70, the signals remain analog signals. One skilled in the art would understand that analog signals do not comprise a plurality of input pixels, as presently claimed. As such, Bilbrey is silent regarding the claimed input signal comprising a plurality of input pixels. As such, claims 1, 12 and

13 are fully patentable over Bilbrey and the rejection should be withdrawn.

Furthermore, Bilbrey is also silent regarding having the first circuit write an output signal to a memory, or an input signal read from a memory, as presently claimed. Since the presently claimed invention, in particular claim 5, relates to a block move engine (BME), and Bilbrey relates to a programmable digital video processing system, it follows that the input signal of Bilbrey is not read from a memory, as presently claimed. Furthermore, Bilbrey is silent regarding one or more input pixels configured to contribute to the creation of one or more output pixels, since the input signal of Bilbrey does not have pixels prior to the circuit 70. As such, the presently claimed invention is fully patentable over Bilbrey and the rejection should be withdrawn.

Newly presented claim 22 is independently patentable over Bilbrey. If the microprocessor 50 of Bilbrey is the claimed second circuit (as asserted in the Office Action), then where is the claimed microprocessor coupled to the second circuit? Bilbrey does not disclose or suggest a first circuit, a second circuit and a microprocessor, as in claim 21. As such, claim 21 is independently allowable over Bilbrey.

Claim 10 is independently patentable over Bilbrey. Bilbrey is silent regarding two or more input pixels contributing

to one or more output pixels. At best, Bilbrey drops pixels, although this is unclear. Therefore, Claim 10 is independently patentable over Bilbrey.

As such, the presently claimed invention is fully patentable over the cited reference and the rejection should be withdrawn.

Accordingly, the present application is in condition for allowance. Early and favorable action by the Examiner is respectfully solicited.

The Examiner is respectfully invited to call the Applicants' representative at 586-498-0670 should it be deemed beneficial to further advance prosecution of the application.

If any additional fees are due, please charge Deposit Account No. 12-2252.

Respectfully submitted,
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